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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.

23 UBER TECHNOLOGIES, INC.;
24 OTTOMOTTO LLC; OTTO TRUCKING
25 LLC,

26 **DECLARATION OF LINDSAY COOPER
27 IN SUPPORT OF DEFENDANTS'
28 ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS (DKT.
684)**

29 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion To File Under
 7 Seal Exhibits To Their Motion To Compel Responses To Interrogatories And Production Of
 8 Documents (Dkt. 684) (“Sealing Motion”). Waymo supports the Sealing Motion to the extent that it
 9 seeks an order sealing the following exhibits designated by Plaintiff:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1A	Highlighted Portions	Plaintiff
Exhibit 3	Highlighted Portions	Plaintiff
Exhibit 6	Highlighted Portions	Plaintiff
Exhibit 18	Entire Document	Plaintiff
Exhibit 21	Highlighted Portions	Plaintiff

15 3. Exhibit 1A is Uber’s First Set of Requests for Production. The Requests contain
 16 descriptions of Waymo’s trade secrets, disclosure of which would be injurious to Waymo.

17 4. Exhibit 3 is Waymo’s Responses to Uber’s First Set of Requests for Production.
 18 Waymo’s Responses contain descriptions of Waymo’s trade secrets, disclosure of which would be
 19 injurious to Waymo. Waymo will file concurrently herewith an unredacted (highlighted) version
 20 identifying the portions that describe Waymo trade secrets, and a corresponding redacted version of
 21 Exhibit 3.

22 5. Exhibit 6 is Waymo’s Responses to Uber’s First set of Interrogatories. Waymo’s
 23 Responses contain descriptions of Waymo’s trade secrets, disclosure of which would be injurious to
 24 Waymo. Waymo’s responses also contain detailed descriptions of Waymo’s internal and confidential
 25 developmental processes and thinking, which if publicly disclosed would be injurious to Waymo
 26 because disclosure would reveal details of Waymo’s highly confidential LiDAR development.
 27 Waymo will file concurrently herewith an unredacted (highlighted) version identifying the portions
 28 that describe Waymo trade secrets, and a corresponding redacted version of Exhibit 6.

1 6. Exhibit 18 is an internal Waymo strategy document. The entire document comprises
2 Waymo's market and competitive analyses, disclosure of any of which would be injurious to Waymo.
3 Competitors' access to this information would harm Waymo's competitive standing because such
4 competitors would have access to Waymo's internal and highly confidential internal business
5 strategies and thinking.

6 7. Exhibit 21 is Waymo's Third Set of Requests for Production to Uber. The highlighted
7 portions describe Waymo's trade secrets, disclosure of which would be injurious to Waymo.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct, and that this declaration was executed in San Francisco, California, on June 26, 2017.

By /s/ Lindsay Cooper
Lindsay Cooper
Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

4 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
5 filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven